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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SONY CORPORATION,

Plaintiff,

v.

VIZIO, INC.,

Defendant.

Case No. CV-08-01135 (RGK)(FMOx)

**SUPPLEMENTAL DECLARATION
OF STEVEN J. CORR IN SUPPORT
OF SUPPLEMENTAL
MEMORANDUM IN SUPPORT OF
JOINT STIPULATION REGARDING
VIZIO, INC.'S MOTION TO
COMPEL EXPERT REPORTS AND
DEPOSITIONS, AND TO COMPEL
DEPOSITIONS OF SONY
WITNESSES IN THE UNITED
STATES**

Date: September 2, 2009
Time: 10:00 A.M.
Judge: Hon. Fernando M. Olguin
Courtroom: 850

1 I, Steven J. Corr, declare as follows:

2 1. I am an associate with Jones Day, counsel of record for Defendant
3 Vizio, Inc. ("Vizio") in this action. I make this declaration in support of the
4 Supplemental Memorandum In Support Of Joint Stipulation Regarding Vizio Inc.'s
5 Motion To Compel Expert Reports And Depositions, And To Compel Depositions
6 Of Sony Witnesses In The United States. The following is based on my personal
7 knowledge and, if called as a witness, I could and would competently testify
8 thereto.

9 2. On August 11, 2009, Sony stated that it would produce its 30(b)(6)
10 witnesses in the U.S., but was unwilling to designate the lead inventors of the
11 asserted patents to testify as 30(b)(6) witnesses.

12 3. Vizio said it would withdraw the Joint Stipulation as it relates to
13 location of depositions if Sony would agree to designate the lead inventor for each
14 asserted patent as a witness for patent-related 30(b)(6) topics, including
15 inventorship, conception and reduction to practice of the alleged inventions.

16 4. Sony said it was willing to consider this proposal, provided that Vizio
17 would consider agreeing to produce witnesses from a non-party, a Taiwanese
18 assembler of Vizio televisions. Vizio refused Sony's counter-proposal because
19 Vizio has no legal right to force employees from the third-party Taiwanese
20 company to appear in the U.S. for deposition. Sony refused to agree to produce
21 lead inventors in the U.S., stating that it would prepare a non-inventor witness to
22 provide testimony on patent-related 30(b)(6) topics, including inventorship,
23 conception and reduction to practice of the alleged inventions.

24 5. Supplemental Exhibit 1 is a true and correct copy of selected transcript
25 excerpts from the Transcript of Proceedings for the April 6, 2009 Hearing in *Sony*
26 *Corp. v. Vizio, Inc.*, No. CV-08-01135 (RGK)(FMOx) (C.D. Cal.).

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Dated: August 19, 2009

JONES DAY

By: /s/ Steven J. Corr
Steven J. Corr

Attorneys for Defendant Vizio, Inc.